

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

FILED 18 OCT 15 PM 2:38  
US BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN

In re:

Bankruptcy Case No 13-53846

City of Detroit, Michigan,

Judge Thomas J. Tucker

Debtor.

Chapter 9

**RESPONSE IN OPOSITION TO DEBTOR TO CITY OF DETROIT'S  
MOTION FOR ENTRY OF AN ORDER ENFORCING THE  
CONFIRMATION ORDER AND BAR DATE ORDER AGAINST TWW  
EMPLOYMENT SOLUTIONS, LLC**

NOW COMES TWW Employment Solution ("TWW") , by and through its attorneys, Marine Adams law PC, and in Response to the Motion for Entry of an Order Enforcing the confirmation Order and Bar Date (" Bankruptcy Order") against TWW states as follows:

1. TWW has filed an action against the City of Detroit Workforce Development Department, and Detroit Employment Solutions Corporation, seeking to recover certain federal monies due and owing TWW as the result of its having perform certain job training services for the Defendants.

2. Employment Solutions, LLC ("TWW") has filed an action in Wayne County Circuit Court to recover certain federal monies due and owing TWW because of a contractual relationship that existed between itself, Workforce Development and its successor-in- interest entity, Detroit Employment Services Corporation ("DESC").

3. That TWW provided certain job training services and expended funds in fulfillment of its contract with Workforce Development.

4. That under its contract was to be reimbursed from federal monies received by Workforce Development. It appears that DESC, as successor-in-interest to Workforce Development, obligated itself to pay its debt.

5. That the City contends that the Bankruptcy Bar Order blocks any attempt by TWW to recover from Workforce Development.

6. That TWW believes that the Bankruptcy Order is not a bar to any action brought against Workforce Development because that entity is separate and distinct from the City.

7. That as a separate and distinct legal entity it is not subject to the Bankruptcy Order.

For these reasons, TWW believe that an order enforcing the City's Bankruptcy Bar date is inappropriate as against WDD or its successor entity DESC.

Respectfully submitted,

MARINE ADAMS LAW PC

By: 

**Anthony Adams, Esq. (P33965)**

**Lynn Marine-Adams, Esq. (P47239)**

*Counsel for Plaintiff*

7650 2<sup>nd</sup> Ave, Suite 113

Detroit, MI 48202

(313)961-5535; Fax (313) 961-9897

[aadams@marineadamslawpc.com](mailto:aadams@marineadamslawpc.com)

[lmadams@marineadamslawpc.com](mailto:lmadams@marineadamslawpc.com)

Dated: October 11, 2018

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re: Bankruptcy Case No 13-53846  
City of Detroit, Michigan, Judge Thomas J. Tucker  
Debtor. Chapter 9

**PROOF OF SERVICE**

The undersigned hereby certifies that on October 10, 2018, he served a copy of the PLAINTIFF'S RESPONSE IN OPPOSITION TO DEBTOR TO CITY OF DETROIT'S MOTION FOR ENTRY OF AN ORDER ENFORCING THE CONFIRMATION ORDER AND BAR DATE ORDER AGAINST TWW EMPLOYMENT SOLUTIONS, LLC and PROOF OF SERVICE to:

1. Charles Raimi, Esq.  
CITY OF DETROIT  
*Counsel for Defendants City of Detroit & City of Detroit Workforce Development*  
Deputy Corporation Counsel  
500 Coleman A. Young Municipal Center  
Detroit, MI 48226
2. Marc Swanson, Esq.  
MILLER, CANFIELD, PADDOCK AND STONE, P.L.C  
150 West Jefferson, Suite 2500  
Detroit, MI 48226

**Via Hand Delivery.**

Respectfully submitted,

MARINE ADAMS LAW, PC

By: 

**Anthony Adams, Esq. (P33965)**

*Counsel for Plaintiff*

7650 2<sup>nd</sup> Ave, Suite 113

Detroit, MI 48202

(313) 961-5535; Fax (313) 961-9897

Dated: October 11, 2018